

MELINDA HAAG (CABN 132612)
United States Attorney

MIRANDA KANE (CABN 150630)
Chief, Criminal Division

JEFFREY D. NEDROW (CABN 161299)
Assistant United States Attorney

150 Almaden Blvd., Suite 900
San Jose, California 95113
Telephone: (408) 535-5054
Facsimile: (408) 535-5066
Email: Jeff.Nedrow@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CR 10-00012-EJD
)	
Plaintiff,)	STIPULATION TO CONTINUE
)	SENTENCING HEARING
v.)	
)	
KENNETH PEREIRA,)	
)	
Defendant.)	

The United States, through its counsel Jeffrey Nedrow, and defendant Kenneth Pereira, through his counsel Michael Hingle, hereby agree and stipulate to continue the sentencing hearing in this case presently scheduled for Monday, October 17, 2011 at 1:30 p.m. to Monday, December 5, 2011 at 1:30 p.m. before this Court. This continuance is requested for the following reasons:

1) Both counsel are requesting additional time to prepare for sentencing in this case. The government requests additional time to evaluate information developed subsequent to the indictment in this case and to finalize its sentencing recommendation, and the defense requests

1 additional time to respond to the government's recommendation.

2 For these reasons, the parties respectfully request that the Court continue the sentencing
3 hearing in this case from October 17, 2011 at 1:30 p.m to December 5, 2011 at 1:30 p.m.. The
4 probation office has been contacted regarding this requested continuance.

5
6
7 It is so stipulated.

8 Respectfully submitted,

9 October 12, 2011

MELINDA HAAG
UNITED STATES ATTORNEY

11 October 12, 2011

12 /s/
JEFFREY D. NEDROW
Assistant U.S. Attorney

13 October 12, 2011

14 /s/
MICHAEL HINGLE
Attorney for Kenneth Pereira

15
16 **ORDER**

17 Based on the stipulation of the parties and the facts set forth herein, good cause
18 appearing,

19 IT IS HEREBY ORDERED that date of the sentencing hearing in this case is continued
20 from October 17, 2011 to December 5, 2011 at 1:30 p.m. before this Court.

21 Dated this 13th day of October, 2011.

22
23 

24 EDWARD J. DAVILA
25 United States District Judge
26
27
28